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LAW OFFICE OF GREGORY T. PARZYCH

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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

INA AND FOR THE COUNTY OF YAVAPAI

STATE OF ARIZONA

Plaintiff,

vs.

STEVEN CARROLL DEMOCKER

Defendant.

No. P1300CR201001325

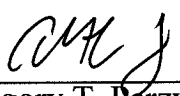

REPLY TO RESPONSE TO REQUEST
FOR DEPOSITION OF DR. KEEN
(Oral Argument Requested)

COMES NOW THE DEFENDANT, by and through his attorney undersigned, and respectfully Replies to the Response to Request for Deposition of Dr. Keen.

The defendant submits that if the practice in Yavapai County is that a party who wishes to interview an expert witness listed by the opposing party must pay for the interview, then the defendant will request the funds to do so. As the Court is aware, current counsel are appointed. As such, all funding is paid for by Yavapai County. Dr. Keen, who at the time of the autopsy in this case, was also employed by Yavapai County. However, Dr. Keen is now requesting that he be paid \$350 an hour for his time during the interview. It is the defense position that Dr. Keen should be paid the rate he was being paid by Yavapai County. The interview will focus on Dr. Keen's participation in this case during the time he was employed by Yavapai County. Since it is Yavapai County who will be paying for the interview, defendant requests this Court to order that the rate of pay be that rate Dr. Keen was paid as an employee of Yavapai County.

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Respectfully submitted this 15 day of August, 2011.


By  
Gregory T. Parzych

Original of the foregoing pleading
filed this 15 day
of August, 2011, to:

Clerk of Court
Yavapai County Superior Court
120 South Cortez St.
Prescott, Arizona 86303

Copy of the foregoing pleading
mailed this 15 day
of August, 2011, to:

The Honorable Warren R. Darrow
Jeffrey Paupore, Steve Young, Office of the Yavapai County Attorney
Craig Williams


By _____
Gregory T. Parzych